

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JEFFREY D. HILL,

Plaintiff,

V.

NEW CASTLE COUNTY POLICE DEPARTMENT, a division of New Castle County; and **NEW CASTLE COUNTY**, a municipal corporation,

Defendants

[illegible]

C.A. No. 07-228 (GMS)

JURY TRIAL DEMANDED

**DEFENDANTS' RESPONSE TO PLAINTIFF'S
MOTION TO AMEND COMPLAINT**

On or about September 21, 2007, Plaintiff Jeffrey D. Hill (“Plaintiff”) filed a Motion for Leave of Court to Amend the Complaint (“Motion”) that was filed on or about April 30, 2007 in the above-captioned matter. In his Motion, Plaintiff seeks to add Sgt. Andrea Hyden (“Hyden”), Capt. Mark Hitch (“Hitch”) and Capt. Quinton Watson (“Watson”) as defendants. These persons are named in their individual and official capacities for alleged discriminatory and retaliatory actions taken against Plaintiff. Plaintiff also seeks to remove New Castle County Police Department as a defendant.

Defendants have no objection to the instant Motion, as the parties have agreed that Defendants will retain the right to assert any and all defenses that are or may become available to them during the course of this action, including but not limited to defenses pertaining to the proposed amendments relative to Hyden, Hitch and Watson.

Respectfully submitted,

/s/ Megan Sanfrancesco

Megan Sanfrancesco, First Assistant County Attorney (#3801)
New Castle County Law Department
87 Reads Way
New Castle, DE 19720
(302) 395-5130
Attorney for Defendants

Date: October 1, 2007